

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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VERONICA MARLENE BARRIENTOS DE  
INTERIANO, and EDWIN AROLDO INTERIANO  
CRUZ

Plaintiffs

v.

Case 2:15-cv-04179-JS

FRANCISCO ALVAREZ, IMMIGRATION  
SERVICES, INC., et al.

Defendants

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TRINIDAD TAPIA OSORIO

Intervenor Plaintiff,

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**MOTION BY PROPOSED INTERVENOR PLAINTIFF TO INTERVENE AND  
REOPEN THIS MATTER TO ENFORCE NOVEMBER 10, 2015 INJUNCTIVE  
ORDER AS TO DEFENDANTS FRANCISCO ALVAREZ AND ALOE VERA  
CARIBBEAN IMPORTS, LLC, d.b.a. IMMIGRATION SERVICES, INC.**

Proposed Intervenor Plaintiff Trinidad Tapia Osorio (“Intervenor Plaintiff Tapia”), by and through his undersigned counsel, moves to intervene and to reopen this matter to enforce the Court’s November 10, 2015 Orders (Dkt Nos. 32 and 33) as to Defendants Francisco Alvarez, and Aloe Vera Caribbean Imports, LLC, d.b.a. “Immigration Services, Inc.”

Intervenor Plaintiff states in support thereof as follows:

1. On November 10, 2015 this Court at Dkt. Nos. 32 and 33 entered a final order in this action as to Defendants Francisco Alvarez and Aloe Vera Caribbean Imports, LLC, d.b.a. “Immigration Services, Inc.”

2. Pursuant to that Order, Dkt No. 33, ¶ 16:

16. Any individual alleging to have been aggrieved by a violation of this Consent Order shall have standing to enforce the Order

3. Pursuant to that Order, Dkt No. 33, ¶ 17:

**Retention of Jurisdiction**


17. The United States District Court for the Eastern District of Pennsylvania shall retain jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

4. Annexed hereto is the Complaint prepared on behalf of Intervenor Plaintiff Tapia for filing as a related matter to this action.

5. Intervenor Plaintiff Tapia requests that this Court grant leave to intervene and to reopen this matter pursuant to the Order of this Court at Dkt No. 33, ¶¶ 16-17, and direct the Clerk of the Court to treat the Complaint filed as a new matter against Defendants therein—Bianca Alvarez, Francisco Alvarez, and Aloe Vera Caribbean Imports, LLC, d.b.a. Immigration Services, Inc.—as a related matter to this case.

Dated: February 25, 2020

Respectfully submitted,

By: 

Arthur N. Read, Esq.

PA ID #: 29360

Email: [aread@justiceatworklegalaid.org](mailto:aread@justiceatworklegalaid.org)

Samuel H. Datlof, Esq.

PA ID #: 324716

Email: [sdarlof@justiceatworklegalaid.org](mailto:sdarlof@justiceatworklegalaid.org)

Justice at Work

990 Spring Garden Street, Suite 300

Philadelphia, PA 19123

Telephone: (215) 733-0878

*Attorneys for Intervenor Plaintiff*

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(b)**

Counsel of record for Defendants to Defendants Francisco Alvarez, and Aloe Vera Caribbean Imports, LLC, d.b.a. "Immigration Services, Inc." has not consented to treating this motion as uncontested.

Dated: February 25, 2020

By:   
Arthur N. Read, Esq.


**CERTIFICATE OF SERVICE**

Intervenor Plaintiff hereby certifies through his counsel that this motion is being filed through the Court's Electronic Case Filing System (ECF), which will electronically serve this motion on all parties of record therein.

Counsel for Defendants Francisco Alvarez, and Aloe Vera Caribbean Imports, LLC, d.b.a. "Immigration Services, Inc." was

Michael I. McDermott  
Attorney at Law  
North American Building  
121 South Broad Street, 18th Floor  
Philadelphia, PA 19107  
215-546-2286 (office)  
215-546-2294 (fax)  
Email: [mmcder1188@aol.com](mailto:mmcder1188@aol.com)

Dated: February 25, 2020

By:   
Arthur N. Read, Esq